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9 Attorneys for USACM Liquidating Trust

10 **UNITED STATES BANKRUPTCY COURT**
 11 **DISTRICT OF NEVADA**

12 In re:

13 USA Commercial Mortgage Company,

14 Debtor.

15 Case No. BK-S-06-10725-LBR

16 Chapter 11

17 **NOTICE OF HEARING ON**
 18 **OMNIBUS OBJECTION OF USACM**
 19 **TRUST TO PROOF OF CLAIM**
 20 **BASED ENTIRELY UPON**
 21 **INVESTMENT IN THE BUNDY**
 22 **CANYON (\$1 MILLION) LOAN**

23 Hearing Date: August 30, 2011

24 Hearing Time: 10:30 a.m.

25 Estimated Time for Hearing: 10 minutes

26 **THE USACM LIQUIDATING TRUST IS OBJECTING TO THE CLAIM**
THAT YOU FILED. THE USACM TRUST SEEKS TO DISALLOW YOUR
CLAIM TO THE EXTENT IT IS BASED UPON AN INVESTMENT IN THE
BUNDY CANYON (\$1 MILLION) LOAN. THE USACM TRUST CONTENDS
THAT YOU DO NOT HAVE A VALID CLAIM BASED UPON YOUR
INVESTMENT IN THIS LOAN BECAUSE YOU TOOK A KNOWN AND
OBVIOUS RISK IN MAKING THAT INVESTMENT AND USACM DID NOT
GUARANTEE REPAYMENT OF THAT LOAN.

27 **PLEASE DO NOT CONTACT THE CLERK OF THE BANKRUPTCY**
COURT TO DISCUSS THE MERITS OF YOUR CLAIM. QUESTIONS



1 **REGARDING THE AMOUNT OF A CLAIM OR THE FILING OF A CLAIM**
2 **SHOULD BE DIRECTED TO BRANT FYLLING AT SIERRA GROUP**
3 **CONSULTING, LLC (602-424-7009) OR TO UNDERSIGNED COUNSEL, JOHN**
4 **HINDERAKER (520-629-4430).**

5 **NOTICE IS HEREBY GIVEN** that the USACM Liquidating Trust, by and
6 through its counsel, has filed its Omnibus Objection of USACM Trust to Proofs of Claim
7 Based Entirely Upon Investment in The Bundy Canyon (\$1 Million) Loan (with
8 Certificate of Service) (the "Objection"). The USACM Liquidating Trust has requested
9 that this Court enter an order, pursuant to section 502 of title 11 of the United States Code
10 (the "Bankruptcy Code") and Rule 3007 of the Federal Rules of Bankruptcy Procedure
11 (the "Bankruptcy Rules"), disallowing your Proof of Claim to the extent it is based upon
12 an investment in the Bundy Canyon (\$1 Million) Loan.

13 **NOTICE IS FURTHER GIVEN** that the hearing on the Objection will be held
14 before the Honorable Linda B. Riegle, U.S. Bankruptcy Court Judge in the Foley Federal
15 Building, 300 Las Vegas Blvd. South, 3rd Floor, Courtroom No. 1, Las Vegas, Nevada on
16 **August 30, 2011, at the hour of 10:30 a.m.**

17 **NOTICE IS FURTHER GIVEN THAT THE HEARING SET ON AUGUST**
18 **30, 2011, WILL BE HELD FOR THE PURPOSE OF STATUS CHECKS AND**
19 **SCHEDULING EVIDENTIARY HEARINGS ONLY. NO ARGUMENTS WILL BE**
20 **HEARD ON THAT DATE.**

21 **NOTICE IS FURTHER GIVEN** that pursuant to Local Rule 9014(d), any
22 response to the objection must be filed and service must be completed no later than
23 **fourteen (14) days** preceding the hearing date. The opposition must set forth all relevant
24 facts and any relevant legal authority.

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the Court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the Court, or if you do not serve your written response on the person who sent you this notice, then:

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* and sustain the objection without formally calling the matter at the hearing.

DATED this 22nd day of July, 2011.

LEWIS AND ROCA LLP

By s/John Hinderaker (AZ 18024)
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Attorneys for the USACM Liquidating Trust

COPY of the foregoing
mailed this 22nd day of
July, 2011, to:

Nevada Freedom Corp.
Ftbo Duane U. Deverill
P.O. Box 4718
Incline Village, NV 89450

LEWIS AND ROCA LLP

s/ Renee L. Creswell